

TO: **COMMISSIONER MICHAEL K. POWELL**

RE: **Commercial Availability of Navigation Devices, CS Docket No. 97-80**

Please excuse any improper approach to this matter; while it may not be proper timing or format for submission of information, the content is very important to the best interest of the public.

I over the last 7 years have taken great interest in media convergence from the aspect of the user interface that the FCC refers to as the "Navigation Device".

I quote Commissioner Susan Ness, **"Digital set top devices are likely to be the gateway between digital bitstreams and new applications that may reside in the intelligent appliances of the future"**. I would like you to consider this should be the case and is the logical path that makes complete sense. The current regulations make this impossible. I quote the FCC **"For the cable television industry, CableLabs, the research arm of the cable industry, agreed to develop interface specifications to connect the components to the host devices."** This puts the cable companies in a state of self regulation in regard to the issue. As such CableLabs has developed a closed system. This system of controlling the consumer interface makes the home network very complex and expensive. This delays the rollout due to many complex issues and existing interface devices are rendered unusable. This also hinders innovation and consumer choice.

In regard to the Navigation Device of choice, the device of choice is not currently a consideration as the enabling factor of this interface has only been made public as of September 24th 2002. Although it was made public it is not generally known on a broad scale and I would like to bring it to your attention. While I can not present scientific user adoption projections, many believe it could be a majority of consumers that would adopt the new interface. This enabling device is described in detail in the provisional patent application U.S. PTO 60/413304 filed 09/24/02. This new innovation is blocked from acceptance as a viable option by the "POD-Host Interface License Agreement" (PHILA) as it blocks open interface and thus hinders innovation and consumer choice.

The opportunity for a low cost system that enables all media in the typical home could be made available to the consumer. It has the potential to close the digital divide by providing a convenient and low cost one box access to all media and computer functions for the home. The system uses existing technology but implements it in a new way. This system needs support at the FCC level to benefit the consumer. In reading the remainder of this letter, please consider the functions of a set-top-box should be made available as a software program and card for use in standard PC hardware with any operating system.

In regards to the removal of analog signals now transmitted and making the bandwidth available for more digital content, the standard PC hardware with a digital TV tuner is a much more flexible and intelligent way for the home to convert to the new digital standard without throwing out the old TV. Eventually the old TV will need to go but meanwhile the consumer can wait for lower pricing yet start using the digital content system immediately and enjoy other added benefits included in the overall system.

I have been working on a system to remove flaws in the implementation of the open standards HTPC systems (Home Theater Personal Computer). In the typical HTPC implementation we have a wireless keyboard and mouse. My system combines these with a wireless secondary display. If you have used a PC with dual display and an HTPC you will easily see what I am talking about. This dual display HTPC system would provide large screen or up close small screen content of any type of media. A switch will swap displays and either display can output from either video source.

The benefits provided to the consumer in this arrangement are many fold. This is especially true for the lower income family yet it also accommodates the extreme high-end of the spectrum where these systems have been typically implemented in the past.

The following list highlights 10 of the broader consumer benefits with this system.

1. The remote control system can display any program or game without disruption to those watching the large screen. This removes the flaws with the past HTPC product offering.
2. The consumer need not purchase multiple home electronics and a separate PC. This removes the digital divide.
3. It has the normal PC interface that the consumer already knows how to use. This enables the full PC value beyond the set-top-box TV only concept for little difference in cost.
4. It makes any PC & TV program portable throughout the house, which includes all entertainment and computing experiences from one portable unit while the large display is also in use.
5. Open architecture provides for multiple operating systems choices and attached devices.
6. Replace all remote controls for entertainment and control home automation.
7. Gain the full benefit of the content and functionality available.
8. Transform the living space into a theatre with connection to existing systems. This provides for the 2007 analog phasing out deadline to be met while the individual consumer makes the move to the HDTV on their own timetable and the old TV systems may continue service as desired.
9. Experience music collections with your favorite player and digital media library.
10. Nothing to go obsolete, the digital home control system in simplified terms is a remote control high resolution display, mouse and keyboard. The current state is a refined product and while some new product types may be introduced in the futures it is not likely that this system will go obsolete for a very long time.

My Digital Home Control System should not be blocked from public use for many reasons. The concept of interactive TV, Internet, interactive games and all computer usage is blended in a way that makes complete sense for the consumer although it is not within the scope of the movie studios and television networks interests. Maybe it is a good time to re-think the overall consumer need and the big picture rather than movie studios and television networks interests.

This system can effectively implement the desired functionality in an acceptable way for the consumer. It has no inherent problems that make it less than desirable for the consumer. Movie studios and television networks interests are blocking the way of progress in removing the digital divide and letting the working class enjoy a better life style, all in the name of copy protection and more profits for these wealthy companies.

Thank You,

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